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Chapter 11 Trustee
8
9

10 **UNITED STATES BANKRUPTCY COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12 **SANTA ANA DIVISION**

13 In re:

14 THE LITIGATION PRACTICE GROUP, PC,
15 Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

16 **DECLARATION OF CHRISTOPHER**
17 **CELENTINO REGARDING LODGMENT**
18 **OF ORDER APPOINTING NANCY**
19 **RAPOPORT AS ETHICS COMPLIANCE**
20 **MONITOR**

21 Date: July 21, 2023

22 Time: 10:00 a.m.

23 Ctrm: 5C

24 Judge: Hon. Scott C. Clarkson
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1 I, Christopher Celentino, declare that the following is true and correct, under penalty of
2 perjury:

3 1. I am an attorney duly licensed to practice before this Court. I am of counsel at the
4 law firm Dinsmore & Shohl LLP, and Special Counsel to Richard A. Marshack, Chapter 11 Trustee
5 (the "Trustee"). I make this Declaration based on personal knowledge and if called to testify to the
6 truthfulness of its contents, could and do so competently.

7 2. Since the sale hearing conducted by the Court on July 21, 2023, we have engaged
8 the Office of the United States Trustee (the "OUST") and the Official Committee of Unsecured
9 Creditors ("OCC") by and through their counsel, Fox Rothschild and attorneys Keith Owens and
10 Nicolas Kofforth; the proposed Monitor, Nancy Rapoport; and the appointed Privacy Ombudsman
11 Lucy Tomson in the review of the proposed ORDER APPOINTING NANCY RAPOPORT AS
12 ETHICS COMPLIANCE MONITOR ("Proposed Monitor Appointment Order"). Redlined
13 versions of the Proposed Monitor Appointment Order were exchanged several times. The Proposed
14 Monitor Appointment Order was uploaded today, Wednesday, August 2, 2023; as of this date, the
15 language therein as prepared by my office and at my direction contains language that addresses all
16 concerns raised by the above parties as of this date, and is approved by Ms. Rapoport, the OCC and
17 the Buyer. I am unaware of any additional comments from the OUST or other parties in interest
18 that are not incorporated therein.

19 3. Today, August 2, 2023, I engaged with the OUST regarding the Proposed Monitor
20 Appointment Order attached to my Declaration filed on August 1, 2023 at [Dkt. No. 350] filed by
21 our office on August 1, 2023. Ms. Ng, of the OUST, indicated:

22 With respect to the Monitor Order, as long as all the UST's requested
23 changes were included in the final version submitted to the Court (including
24 the removal of the consent language), the UST has no further issue as well.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on August 2, 2023 at San Diego, California.

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 655 W. Broadway, Suite 800, San Diego, California 92101

A true and correct copy of the foregoing document entitled: **DECLARATION OF CHRISTOPHER CELENTINO REGARDING LODGMENT OF ORDER APPOINTING NANCY RAPOPORT AS ETHICS COMPLIANCE MONITOR**

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On August 2, 2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On August 2, 2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on August 2, 2023, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

JUDGE'S COPY

The Honorable Scott C. Clarkson
United States Bankruptcy Court
Central District of California
Ronald Reagan Federal Building and Courthouse
411 West Fourth Street, Suite 5130 / Courtroom 5C
Santa Ana, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 2, 2023
Date

Caron Burke
Printed Name

/s/ Caron Burke
Signature

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